# **EXHIBIT** A

Judy B. Calton (P38733) 2290 First National Building 660 Woodward Avenue Detroit, MI 48226-3506 Telephone: (313) 465-7344 Facsimile: (313) 465-7345 Email: jcalton@honigman.com	TIN LLP
Attorneys for Affinia Group Holdings Inc.	
UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK	
DELPHI CORPORATION, et al.	Chapter 11 Case No. 05-44481 (RDD) Jointly Administered _/
DELPHI CORPORATION, et al.,	
Plaintiffs,	Adv. Pro. No. 07-02198(RDD)
Against	
AFFINIA GROUP HOLDINGS, INC., AFFINIA CANADA CORP., BRAKE PARTS, INC., ITAPSA S.A. DE C.V. AND WIX FILTRATION PRODUCTS EUROPE	
Defendants.	

#### **DECLARATION OF SUSAN J. STEWART**

Susan J. Stewart declares as follows:

- 1. I am the Assistant Secretary of Affinia Group Holdings Inc. ("Holdings") and many of the subsidiaries of Holdings. Holdings and its subsidiaries are referred to collectively as the "Affinia Companies."
  - 2. I make this Declaration upon personal knowledge and if called as a witness would

testify to the facts contained herein.

- 3. The Affinia Companies include Holdings, Affina Group, Inc. ("Group"), Brake Parts, Inc. ("Brake Parts") and Affinia Canada, Ltd. ("Canada"), among other companies.
- 4. Holdings is a pure holding company, the ultimate owner, directly or indirectly, of the other companies comprising the Affinia Companies. Holdings has no business operations. Holdings did not manufacture or supply parts or goods to any customer. Holdings did not enter into contracts with Delphi Corporation or any of its various affiliates ("Delphi"). Holdings had no contracts with Delphi Automotive Systems, LLC ("DAS"), which is the only remaining Plaintiff in this action.
- 5. Similarly, Group did not supply any parts or goods to Delphi. Group's records show that Delphi did not owe it anything during the 90 days before Delphi's bankruptcy cases were filed.
- 6. Holdings was not a creditor of Delphi and did not file a proof of claim against Delphi or request notice in the Delphi bankruptcy cases. Holdings, Group and Brake did not have an attorney appear for them in the Delphi case or file a request for notice in the Delphi case.
- 7. I have been responsible for gathering documents, including records from the Affinia Companies treasury department, in response to the proposed First Amended Complaint to Avoid and Recover Transfer Pursuant to 11 U.S.C. §§547 and 50 (the "Amended Complaint") against Holdings and Brake Parts. A copy of the Exhibit 1 to the Amended Complaint is attached as Exhibit 1 hereto.
- 8. The Amended Complaint alleges that DAS made five transfers to Holdings in September 2005, totaling \$5,575,474.84 (collectively, the "Holdings Transfers"), as follows:

Transfer Recipient	Transferring Entity	Transfer Date	Transfers Amount	Antecedent Debt/ Check Number	Purchase Order/ Invoice	Transfer Type
Holdings	DAS	9/1/2005	\$3,025,474.84			Check
Holdings	DAS	9/26/2005	\$650,000.00	C2000042158		Check
Holdings	DAS	9/21/2005	\$750,000.00	C2000042046		Check
Holdings	DAS	9/21/2005	\$400,000.00	C2000042047		Check
Holdings	DAS	9/15/2005	<u>\$750,000.00</u>	C2000041910		Check
Total			\$5,575,474.84			

- 9. There is no purchase order or invoice information provided for any of the Holdings Transfers.
- 10. There is no antecedent debt information of any manner at all provided for the 9/1/2005 Holdings Transfer in the amount of \$3,025,474.84.
- 11. Although purported check numbers appear in the antecedent debt column, a check number does not represent antecedent debt. Further, as explained below in Paragraphs 16 and 17, I do not believe the entries in that column are actually check numbers.
- 12. None of the Holdings Transfers were on account of an antecedent debt to Holdings, because Holdings did not do business with Delphi and neither Delphi nor DAS owed any debt to Holdings.
- 13. Further, Holdings, which is a remaining defendant in this action, did not receive any of the Holdings Transfers. Attached as Exhibit 2 is a redacted copy of Holdings' bank statement for the period September 1, 2005 through September 30, 2005, which demonstrates Holdings did not receive any of the Holdings Transfers.
- 14. Group, which is not a defendant in this action, as a mere conduit for Canada, received the following three out of the Holdings Transfers totaling \$1,800,000.00 (the "Group

#### Transfers"):

Transfer Date	Transfer Amount
9/26/2005	\$650,000.00
9/21/2005	\$400,000.00
9/15/2005	\$750,000.00
Total	\$1,800,000.00

- 15. Group did not receive the other two Holdings Transfers totaling \$3,775,474.85 (the "Unknown Transfers").
- 16. Attached as Exhibit 3 is a redacted copy of Group's bank statement from September 2005, demonstrating it did receive the Group Transfers totaling \$1,800,000.00, but did not receive the two Unknown Transfers for \$3,725,474.84.
- 17. Further, contrary to the allegations in the Amended Complaint, DAS was not the transferring entity for the Group Transfers, and the Group Transfers were not made by check.
- 18. Attached as Exhibit 4 are the wire details from JPMorgan Chase for the Group Transfers (the "Wire Detail"). The Wire Detail demonstrates that the transferring entity for each of the Group Transfers was Delphi Corporation, not DAS. Delphi Corporation has been dismissed with prejudice as a plaintiff in this action. The Wire Detail also demonstrates that the Group Transfers were transmitted by wire, not check.
- 19. Holdings and Brake did not receive any of the motions filed by Delphi seeking extensions of time to serve preference complaints. Holdings and Brake did not know they had been sued by Delphi until 2010.
- 20. Holdings does not recall whether it received a disclosure statement from Delphi in December 2007, or if it received it, whether it chose to read it, because Holdings was not a creditor of Delphi.

- 21. The Affinia Companies closed numerous facilities worldwide between 2005 and 2009, including virtually every facility which had done business with Delphi, including the following:
  - (a) plant in St. Catharines, Ontario, closed 2007;
  - (b) plant in Mississauqa, Ontario closed 2007;
  - (c) plant in Sudbury, Ontario, closed 2007; and
  - (d) sales office in Troy, Michigan, closed 2008.
- 22. In closing these facilities, the Affinia Companies terminated their employees who had worked closely with Delphi.
- 23. As a matter of policy, when an employee of the Affinia Companies is terminated, the hard-drive of the employee's personal computer is cleaned. The Affinia Companies have no ability to locate the data that was at one time stored on the hard drives of terminated employees.
- 24. The terminated employees who had direct contract with Delphi on behalf of the Affinia Companies include the following:
  - (a) Elaine Wareham, Canada Credit Manager;
  - (b) Licinia Branco, Canada Credit Specialist; and
  - (c) Teena Tourlousse, Canada Credit Specialist.
- 25. In addition, Ted Lazarcheff, the Affinia Companies' Vice President of Sales, died in 2007. Mr. Lazarcheff's computer hard drive was cleaned.
- 26. Thus the e-mails of the terminated employees and Mr. Lazarcheff are not longer available.
- 27. The computer data to back up the following categories of documents were destroyed in connection with the Affinia Companies' shut down of facilities:
  - (a) correspondence relating to Delphi making advance deposits for Canada

shipments in 2005;

- (b) detail of intercompany transfers of Delphi funds for Canada; and
- (c) banking documents.
- 28. At the time the Affinia Companies' employees were terminated, the Affinia Companies made no arrangements to obtain information about the issues raised in the Delphi's lawsuit, whether in the exit interviews or otherwise. Mr. Lazarcheff is no longer available. Other former employees may no longer be able to be contacted at the 2007 information in their Affinia Companies employment files.
  - 29. I make this Declaration under penalty of perjury.

Susan J. Stewart

Executed in Ann Arbor, Michigan on November 22010

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# EXHIBIT 1

EXHIBIT 1
Delphi Automotive Systems, LLC v. Affinia Group Holdings Inc. and Brake Parts Inc.
Adv. Pro. No. 07-02198 [RDD]

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Transfer/Amounts (Names-Africa dentition)		C2000042158	C2000042046	C2000042047	C2000041910	HE025004920642001	HE025004967331001	HE025005001334001	D0550028732	D0550071589	D0550074317	D0550074416	D0550038516	D0550071714	D0550071715	D0550074317	D0550028732	D0550071589	D0550071714	D0550071715	D0550074317	D0650074415	D0550038516	D0550038516	D0550071714	D0550071715	D0650074317	D0650074415	D0550028732	D0550071589	D0550071714	D0650071715	D0550074317	D0550038616
nsfine?Actionaries	3,025,474.84	650,000.00	750,000.00	400,000.00	750,000.00	29,696.00	29,696.00	29,696,00	20,941.74	26,115,71	3,065.83	10,728.77	22,272.00	3,601.48	8,996.13	8,651.65	3,619,56	1,384.46	30,211.62	18,055.17	1,234.24	754.00	18,560.00	14,848.00	6,551.40	7,826.47	13,176.31	1,324.96	7,873.12	1,379.84	11,785.36	15,245.19	19,807.69	7,424.00
Total Land	\$  5002/1/6	\$  9002/92/6	9/21/2005 \$	\$ 21/2005 \$	9/15/2005 \$	7/41/2005 \$	7/11/2005  \$	7/11/2005  \$	\$  5002/2/8	\$   \$2002/2/8	\$  5002/2/8	\$  5002/2/8	8/8/2005  \$	8/29/2005 \$	8/29/2005 \$	8/30/2005 \$	\$  5002/2/6	8/2/2005	\$   \$007/2/6	9/2/2005 \$	\$  9002/2/6	\$  5002/2/6	\$  5002/1/6	8/23/2005 \$	8/30/2005  \$	\$  5002/08/6	\$  3002/06/6	9/30/2005	10/4/2005  \$	10/4/2005  \$	10/4/2005  \$	10/4/2005  \$	10/4/2005  \$	10/6/2005 \$
் ம்தித்தாகதி ராஜன் நாந்தி இருந்	DASILC	DASILC	DASILC	OTISYO	DAS LLC	DASILIC	DASILC	OMS ITC	OMS LLC	DASILC	DASILIC	DASTLC	DASTLC	DASILC	DASILC	DASILC	DASILIC	DASILC	DASLLC	DASILC	OT⊓S¥G	DASLLC	DAS LLC	DAS LLC	DASILC	DASILC	OAS LLC	DAS/LC	DAS LLC	DASILC	DASILIC	DASILIC	DASILC	DASILC
Contracting Entity(Entities	DASTLC	DASLLC	DASILIC	DASILC	DASILC	DASILC	DASILC	DASILC	DASILC	DASLLC	DASLLC	DASILIC	DASILC	DASILIC	DASILC	DASTLC	DASTLC	DASLLC	DASTLC	DASILC	DASILC	DASLLC	DASLIC	DASILIC	DASILC	DASTLC	DASTLC	DASILC	DASILC	DASILC	DASILC	DASTLC	DASILC	DASLLC
Taine (selptorio)	AFFINIA GROUP HOLDINGS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC	BRAKE PARTS INC				
Burpessay	07-02198	07-02198	07-02198	07-02196	07-02198	07-02196	07-02:198	07-02198	07-02198	07-02198	07-02198	07-02:188	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198	07-02188	07-02198	07-02198	07-02188	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198	07-02198

Total Amount of Claims \$ 6,949,797.54

05-44481-rdd Doc 20841-2 Filed 11/23/10 Entered 11/23/10 11:37:12 Exhibit A. Stewart Declaration Pg 10 of 31

EXHIBIT 2

# 05-44481-rdd Doc 20841-2 Filed 11/23/10 Entered 11/23/10 11:37:12 Exhibit A. Stewart Declaration Pg 11 of 31

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Page 2 of 3

BANK FONE.

CHASE O

JPMorpan Chass Bank, N.A. Illinote Market P O. Box 250180 Baton Rouge, LA 70826-0180

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00049284 ODA 111 JA 27405 - REIN T 1 000000000 63 0000

AFFINIA GROUP HOLDINGS INC 1101 TECHNOLOGY DR ANN ARBOR MI 48108-8924 Suptamber 01, 2005 through Suprember 30, 2005 Account Number: [ REDACTED]

#### CUSTOMER SERVICE INFORMATION

If you have any questions about your statement, please contact your Customer Service Representative.



Sep 29 2010

HURRICANE REIIEF: CASH AND CHECK DONATIONS TO THE AMERICAN RED CROSS SPECIFICALLY FOR HURRICANE SUPPORT CAN BE MADE AT ANY CHASE OR BANK ONE BRANCH. FOR THE THOUSANDS AFFECTED WE'RE ALSO PROMDING SPECIAL ASSISTANCE: CALL 877-CHASEOS OR CLICK ON CHASE.COM FOR MORE INFORMATION

### CHECKING SUMMARY Commorcial Chacking

	<b>PLSTANCES</b>	IMUGAKA
Beginning Balance		\$0.00
Deposits and Additions		25,000.00
Ending Balance	1	\$25,000.00

#### **DEPOSITS AND ADDITIONS**

DATE U

09/22

DESCRIPTION

Fed Wire Credit Viz: Chlbank

[REDACTED ]

AMOUNT \$25,000 00

Total Deposits and Additions

\$25,000.00

Your service charges, fees and earnings credit have been calculated through account analysis.

#### DAILY ENDING BALANCE

DATE

AMOUNT

09/22

\$25,000.00

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Fax Server

Page 3 of 3

Sep 29 2010

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CHASEO

Suptember 01, 2005 through September 30, 2005 Account Number: [REDACTED]

#### BALANCING YOUR CHECKBOOK

Use the following worksheet to reconcile your checking account.

Mark in your chackbook all additions and subtractions reported on your statement.

1. Write in the on this state	ending balance Sment See		25,000.
•	sits and other cale on neworks ton (one d antone ent of lat	ihie siatement	
Total all deposit		her subtraction	s
Subject this to	bil from the ending	Amount	
<del></del>		·····	_
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Total all withdrawals and subtractions

in your checkbook

4. This total should maich the current balance

**-** 5

**-\$** 

IN CASE OF BLIORS OR QUESTIONS ABOUT YOUR ELECTRONIC FURBS
TRANSFEEL: Telephone or write the bank (phone & and address on iron of statement) & you think your statement is wrong, or if you need more information about a transaction listed on the statement or receipt. We must heer from your no later than 60 days after we sent you the list statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number
- The dollar amount of the suspecial error
   A description of the error or transfer you are uneared, why you believe it is an error, or why you need more information.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will creat your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC
TRANSACTIONS: Contact the bank immediately flyour statement is
incorrect or if you need more information about any non-electronic
transactions (checks or deposits) on file statement. It any such
arror appears, we must hear from you no later than 30 days after
the statement was made available to you. For more complete
datalis, see the account rules and regulations that govern your
secount.

#### BILLING RIGHTS SUMMARY

st CASE OF ERRORS OR QUESTIONS ABOUT YOUR BRU: If you think your bill is wrong, or if you need more information about a transaction on your bill, write us on a separate cheel of paper at the address Ested on the front of your elabament as soon as possible. We must hear from you no taler than 60 days after we sent you the first bill on which the error or problem appeared. You can telephone us, but doing so will not preserve your rights

- In your latter, give us the following information:

  Your name and account number:
  The dollar amount of the suspected error
  Describe the error and explain, If you can, why
  you believe there is an arror, if you need more
  information, describe the term you are unsure of
  Your signature and the date

You do not have to pay any amount in question while we are investigating, but you are still obligated to pay the parts of your bit that are not in question. While we investigate your question, we cannot report you as delimpent or take any sotion to collect the amount you question.

sPECAI RUE FOR CREDIT CARD PURCHASSS: If you have a problem with the quality of goods or services that you purchased with a crede card and you have tried in good faith to correct the problem with the membant, you may not have to pay the remaining amount due on the goods or services. You have this protection only when the purchase was made in your home state or within 100 miles of your making address. (If we own or operate the merchant, or if we malled you the advertisement for the property or services, all purchases are covered regardless of amount or location of purchase.)



**EXHIBIT 3** 

#### BANKSONE.

## CHASEO

JPMorgan Chase Bank, N.A. Illinois Market P.O. Box 260180 Baton Rouge, LA 70826-0180

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September 01, 2005 through September 30, 2005 Account Number: [REDACTED]

#### CUSTOMER SERVICE INFORMATION

If you have any questions about your statement, please contact your Customer Service Representative.



HURRICANIE RELIEF: CASH AND CHECK DONATIONS TO THE AMERICAN RED CROSS SPECIFICALLY FOR HURRICANE SUPPORT CAN BE MADE AT ANY CHASE OR BANK ONE BRANCH. FOR THE THOUSANDS AFFECTED WE'RE ALSO PROVIDING SPECIAL ASSISTANCE:
CALL 877-CHASEOS OR CLICK ON CHASE.COM FOR MORE INFORMATION.

# CHECKING SUMMARY

Commercial Checking

	INSTANCES	AMOUNT
Beginning Balance	•	[REDACTED]
Deposits and Additions	91	969,459,102,69
Electronic Withdrawals	69	- 155,916,211,25
Other Withdrawals, Fees & Charges	137	- 808,105,279,44
Ending Balance	297	[ REDACTED]
Sweep Investment Account Ending Balance		[ REDACTED]
Fund Name Investment		[ REDACTED]
Total Ending Balance		

## **DEPOSITS AND ADDITIONS**

DATE	DESCRIPTION		AMOUNT
09/01	Transler From	[ REDACTED ]	\$21,990,955,28
09/01	Transfer From Zero Balance	[ REDACTED ]	303,869,06
09/01	Mail Deposit	Ē ********* }	
09/01	Interest Paid To	[ REDACTED ]	10,574.65
09/02	Transfer From	[ REDACTED ]	1,740.95
		f KENYCIED 1	20,054,909,40
09/02	Transfer From Zero Balance	[ REDACTED ]	5,985,756.69

# CHASE O

September 01, 2005 through September 30, 2005
Account Number: [REDACTED ]

BALANCING YOUR CHECKBOOK	
Use the following worksheet to reconcile your checking account.	IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS
Mark in your checkbook all additions and subtractions reported on your statement.	front of statement) if you think your statement is wrong, or if you need more information about a transaction listed on the statement or receipt. We must hear from you no later than 60 days after we sent you the first statement or which the brighting corrections.
1. Write in the ending balance shown	appeared. Be prepared to give us the following information:
on this statement \$ [REDACTED]	<ul> <li>Your name and account number</li> <li>The dofar amount of the suspected error</li> <li>A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information</li> </ul>
2. List all deposits and other additions	more information
(such as transfers) not shown on this statement	We will investigate your complaint and will correct any error
and add the total to the ending balance.	promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.
Total all deposits and additions +\$	IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC TRANSACTIONS; Contact the bank immediately if your statement is incorrect or if you need more information about any non-electronic transactions (checks or deposits) on this statement. If any such error appears, we must hear from you no later than 30 days after the statement was made available to you. For more complete details, see the account rules and regulations that govern your account.
3. List all withdrawals and other subtractions	details, see the account rules and regulations that govern your account.
(such as outstanding checks and banking card bransactions) not shown on this statement. Then subtract this total from the ending balance.	BILLING RIGHTS SUMMARY
Check Number Date Amount	IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR Bitt: If you think your bill is wrong, or if you need more information about a transaction on your bill, write us on a separate sheet of paper at the address listed on the front of your statement as soon as possible. We must hear from you no later than 80 days after we sent you the first bill on which the error or problem appeared. You can telephone us, but doing so will not preserve your rights.
	In your letter, give us the following information:  Your name and account number  The deliar amount of the suspected error  Describe the error and explain, if you can, why you believe there is an error; if you need more information, describe the item you are unsure of  Your signature and the date
	You do not have to pay any amount in question while we are investigating, but you are still obligated to pay the parts of your bill that are not in question. While we investigate your question, we cannot report you as delinquent or take any action to collect the amount you question.
Total all withdrawals and subtractions  - \$	SPECIAL RULE FOR CREDIT CARD PLRCHASES: If you have a problem with the quality of goods or services that you purchased with a credit card and you have tried in good faith to correct the problem with the merchant, you may not have to pay the remaining amount due on the goods or services. You have this protection only when the purchase price was more than \$50 and the purchase was made in your home state or within too miles of your mailing address. (If we own or operate the merchant, or if we mailed you the advertisement for the property or services, all purchases are covered regardless of amount or locallon of purchase.)
in your checkbook = \$	the advertisement for the property or services, all purchases are covered regardless of amount or location of purchase.)

Member FDIC

# CHASEO

DATE 09/02	DESCRIPTION Fed Wire Credit Via: Wachovia Bank [REDACTED]	AMOUNT
00.02	CONTINUE CARGIT VIE. VARCHOWIE DERK [KEDACTED]	655,205.33
00.00	· · · · · · · · · · · · · · · · · · ·	
09/02 09/02	Interest Paid To [REDACTED] CDA Funding Transfer From [REDACTED]	1,587.68
09/06		150.00
09/08	Transfer From [REDACTED] Transfer From Zero Balance [REDACTED]	26,404,651.41
09/06	I ransfer From Zero Balance [REDACTED]  Book Transfer Credit B/O [REDACTED]	1,830,942.35
03,00	•	1,750,000.00
09/08	Fed Wire Credit Via: Wachovia Bank [REDACTED]	206,640.46
	ė.	
09/06	Interest Paid To ( [REDACTED]	8,361.54
09/07	Transfer FromEREDACTED ]	28,685,419,64
09/07	Book Transfer Credit B/O: [REDACTED] Trn: [REDACTED]	t5,000,000,00
09/07	Transfer From Zero Balance [REDACTED]	724,953,96
09/07	Interest Paid To [REDACTED]	2,270,99
09/08	Transfer From [REDACTED]	25,417,776.80
3/08	Transler From Zero Balance [REDACTED]	549,813.34
09/08	Interest Paki To [REDACTED]	2,012.2
09/09	Transfer From [REDACTED]	17,633,859.59
09/09	Transfer From Zero Balance . [REDACTED]	893,475,8
09/09	Fed Wire Credit Via: Wachovia Bank F [REDACTED]	619,344.49
09/09	Interest Paid To [REDACTED]	1,396.01
09/12	Transfer From [REDACTED]	17,825,514.86
09/12	Transfer From Zero Balance [REDACTED]	3,842,065,1
09/12	Deposit	16,572.04
09/12	Mail Daposit	14,768.4
09/12	Interest Paid To 2 [REDACTED]	4,233.5
09/13	Transfer [REDACTED]	17,870,155.2
9/13	Book Transfer Credit B/O: [REDACTED]	10,000,000.0
9/13	Book Transfer Credit B/O: [REDACTED]	10,000,000.00
9/13	Transfer From Zero Balance [REDACTED]	A EGO FAA A
9/13	Fed Wire Credit Via: [REDACTED]	4,593,528.33
	- -	440,425.22
9/13	Fed Wire Credit Via: Fifth Third Bank(Merge) [REDACTED]	131,900.2
	~	
9/13	Interest Paid To [REDACTED]	1,414.7



# CHASE ()

DEPO	SITS AND ADDITIONS (continued)	
DATE	DESCRIPTION	AMOUNT
09/14	Transfer From [REDACTED]	26,216,449.93
09/14	Transfer From Zero Balance [REDACTED]	1,675,580.62
09/14	Interest Paid To [REDACTED]	2,075.47
09/15 09/15	Transfer From [REDACTED] Transfer From Zero Balance [REDACTED]	28,317,421,69
09/15		2,472,124.93
•	Book Transfer Credit B/O: Delphi Corporation-Wire Transfphoenix AZ 85026- Org: 399999999 Ref: Frs# 9120506 Trn: 2641700258Jo	750,000,00
09/15	Interest Paid To [REDACTED]	2,241.80
09/16 09/16	Transfer From [REDACTED]	28,315,827,57
09/16	Transfer From Zero Balance [REDACTED]	17,377,210.27
09/10	Fed Wire Credit Via: Wachovia Bank [REDACTED]	457,403.34
09/16	Book Transfer Credit B/O: Delphi Corporation-Wire Transfphoenix AZ 85026- Org: 399999999 Ref: Frs# 9160502 Trn: 2347700259Jo	400,000.00
09/16	Interest Paid To [REDACTED]	
09/19	Transfer From [REDACTED]	2,241.65
09/19	Transfer From Zero Balance [REDACTED]	30,128,080.78
09/19	Interest Paid To [REDACTED]	53,380,289.61
09/20	Transfer From [REDACTED]	7,155.42
09/20	Transfer From Zero Bafance [REDACTED]	46,876,823.08
09/20	Fed Wire Credit Via: [REDACTED]	4,088,685,73 446,096.18
20.400	t	
09/20	Interest Paid To [REDACTED]	3,711.08
09/21	Transfer From ( [REDACTED ]	83,635,975.44
09/21	Transfer From Zero Balance [REDACTED]	6,142,794.84
09/21	Book Transfer Credit B/O: [REDACTED]	4,000,000.00
09/21	interest Paid To [REDACTED]	6,621.18
09/22	Transfer From [REDACTED]	92,040,948.60
09/22	Book Transfer Credit B/O: Delphi Corporation-Wire Transfphoenix AZ 85026- Org: 399999999 Rei: Frs# 9200502 Trn: 2747000265Jo	850,000.00
09/22	Transfer From Zero Balance [REDACTED]	276,927.69
09/22	Mail Deposit	5,708,87
09/22	fnterest Paid To [REDACTED]	7,286,58
09/23	Transfer From [ REDACTED]	96,308,167.09
09/23	Transfer From Zero Balance [REDACTED]	1,150,422.01
09/23	Fed Wire Credit Via: Wachovia Bank [REDACTED]	404,799.45
09/23	Interest Paid To [REDACTED]	
09/26	Transfer From [REDACTED]	7,624.40
09/26	Transfer From Zero Balance [REDACTED]	50,796,566.03
	[WIDIOTED]	1,944,755.16

09/02

# CHASE @

DATE 09/26	DESCRIPTION Fed Wire Credit Via: Fifth Third Bank(Merge)Old Ken [REDACTED]	AMOUNT 6,368.12
09/26	Interest Paid To [REDACTED]	12,064.18
09/27	Transfer From [REDACTED]	51,498,136.05
09/27	Transfer From Zero Balance [REDACTED]	911,722.52
09/27	Fed Wire Credit VIa: Wachovia Bank [REDACTED]	429,543.24
09/27	Deposit	5,791.02
09/27	Deposit	3,099.64
09/27	interest Paid To [REDACTED]	4,434.56
09/28	Transfer From [REDACTED]	33,556,951.90
09/28	Transfer From [REDACTED]	2,325,029.22
09/28	Interest Paid [REDACTED]	2,889.63
09/29	Transfer From [REDACTED]	24,008,289.55
09/29	Book Transfer Credit B/O: [REDACTED]	5,000,000.00
9/29	Transfer From Zero Balance [REDACTED]	1,652,481.41
)/29	Interest Paid To [REDACTED]	2,067.38
09/30	Transfer From [REDACTED]	30,217,021.47
09/30	Transfer From Zero Balance [REDACTED]	6,913,784,28
9/30	Fed Wire Credit Via: Wachovia Bank NA [REDACTED]	1,079,586.52
09/30	Fed Wire Credit Via: U.S. Bank, N.A [REDACTED]	53,000.00
9/30	interest Paid To [REDACTED]	2,602.02
otal Depo:	sits and Additions	\$969,459,102.69
LECTRO	NIC WITHDRAWALS	
ATE 9/01	DESCRIPTION [REDACTED]	AMOUNT
104		
9/01		
9/01		
9/02		

CHASEO

ELECTR	ONIC WITHDRAWALS 4	continued)	
DATE 09/02	DESCRIPTION		AMOUNT
09/06			
09707			
09/07			
09/07			
09/07		[REDACTED [	
09/08			
09/08			
09/08			
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09/28

# CHASE @

DATE 09/21	DESCRIPTION	AMOUN 447.70
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9/22	[REDACTED]	
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CHASE O

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[REDACTED]	
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09/07 09/08 79/08 .9/08 09/08

# CHASEO

STECHONIC MILHDRAMATZ SCOUN	nusaj	
DATE DESCRIPTION		
09/30		
09/30		
09/30		
05,00		
Total Electronic Withdrawals		[REDACTED]
		[KEDACIED]
OTHER WITHDRAWALS, FEES & CH	ARGES	
DATE DESCRIPTION		
09/01		AMOUNT
09/01		
09/01		
09/01		
09/01	[REDACTED]	
09/01		
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## CHASE O

DATE	DESCRIPTION		Å 9 fanks m
9/08			AMOUN
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9/09		[REDACTED[	
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09/22 09/22 09/22 19/22 J9/23 09/23 09/23 09/23 09/23 09/23 09/23 09/26 09/26 09/26 09/26 09/26 09/26 09/27 09/27 09/27 09/27 09/27 09/27 09/28 09/28 09/28 °9/28 J9/28 09/29 09/29

## CHASE O

September 31, 2005 through September 30, 2005 Account Number: [REDACTED]

OTHER	WITHDRAWALS, FEES & CHARGES	(continued)	
DATE	DESCRIPTION		AMOUNT
09/19			MOORI
09/20			
09/20			
09/20		[ DED A CHED ]	
09/20		[REDACTED]	
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09/22			
09/22			
09/22			



27431622760010006

CHASE O

September 01, 2005 through September 30, 2005
Account Number: [REDACTED]

OTHER	WITHDRAWALS, FEES &	CHARGES (continued)	
DATE	DESCRIPTION	Ann	OUNT

[REDACTED]

Total Other Withdrawals, Fees & Charges

[REDACTED]

Your service charges, fees and earnings credit have been calculated through account analysis.

DAILY ENDING BALANCE AMOUNT [REDACTED] DATE DATE THUOMA 09/01 [REDACTED] 09/19 09/02 09/20 09/06 09/21 09/07 09/22 09/08 09/23 09/09 09/26 09/12 09/27 09/13 09/28 09/14 09/29 09/15 09/30 09/16

05-44481-rdd Doc 20841-2 Filed 11/23/10 Entered 11/23/10 11:37:12 Exhibit A. Stewart Declaration Pg 26 of 31

**EXHIBIT 4** 

From: Joe A Miller [mailto:joe.a.miller@jpmchase.com]
Sent: Friday, October 08, 2010 9:18 AM
To: Bitel, Eric
Subject: 2005 deposits

Eric,

Here are the wire details for the credits in question.

Search > Funds Transfer > Transaction Search Details

Payment Type and Details >

Status:

COMPLETED

Transaction

15-Sep-05

TRANSACTIONS

Date: Amount:

\$750,000.00

Transaction

**Book Transfer** 

Sequence #: None

Type:

**JPMorgan** 

10/8/2010

Page 2 of 5

DR Value Reference: 2641700258JO

Date: CR Value 15-Sep-05 Date:

Debit Party > Credit Party >

Account ID: DDA - xxxxx7590 Account ID: DDA - 00000xxxxx [REDACTED]

DELPHI Name: AFFINIA GROUP INC CORPORATION-WIRE Address: 1101 TECHNOLOGY DR

TRANSFER AC ANN ARBOR MI 48108-

Address: **CASH MGMT** 

**BUSINESS PROCESS** SOLUTION CENTER PHOENIX AZ 85026-

Intermediary Party > Beneficiary Party >

Account ID: Account ID: Name: Name: Address: Address: Order Party > Order Bank >

Account ID: Account ID: Name: 399999999 Name:

Address: Address: 4th Credit Party >

Account ID: Name: Address:

Name:

Other Information >

Details:

Credit Mail Advice: Cr Adv Type: Advice

Source: CAP Debit +050915010

Bank/Bank Reference: Info: Credit CAP OF 05/09/15

Reference: 71G Amount: Release Time 15:13:57 Bene-D by (EST): CHIPS/FED Existing Flag:

No Inquiry: Cover No Payment Payment: FRS# 9120506

Search > Funds Transfer > Transaction Search Details

Payment Type and Details >

COMPLETED Status: Transaction 16-Sep-05 TRANSACTIONS

Date: Transaction **Book Transfer** \$400,000.00 Amount: Type:

Sequence #: None JPMorgan 2347700259JO DR Value

Reference: Date:

CR Value

Page 3 of 5

Date: 16-Sep-05

Debit Party > Credit Party >

Account ID: DDA - xxxxx7590

DELPHI

Name: CORPORATION-WIRE

TRANSFER AC

Address: CASH MGMT

> BUSINESS PROCESS SOLUTION CENTER PHOENIX AZ 85026-

Intermediary Party >

Account ID: Name: Address:

Order Party >

Account ID:

Name: 3999999999

Address:

4th Credit Party > Account ID: Name:

Address:

Other Information >

Credit Advice: Mail

Debit Reference:

+050916012

CAP OF 05/09/16

Credit

Reference:

Release Time 15:12:39

(EST): Existing

Inquiry:

Payment Details:

FRS# 9160502

Account ID: DDA - 00000xxxxxx [REDACTED]

Name:

AFFINIA GROUP INC

Address: 1101 TECHNOLOGY DR

ANN ARBOR MI 48108-

Beneficiary Party >

Account ID: Name: Address:

Order Bank >

Account ID: Name:

Address:

Cr Adv Type: Advice

Source: CAP Bank/Bank

Info:

71G Amount:

Bene-D by CHIPS/FED Flag:

Cover Payment:

No

No

Search > Funds Transfer > Transaction Search Details

Payment Type and Details >

Transaction 22-Sep-05 Date:

\$650,000.00 Amount: None

Sequence #: DR Value

Date:

Status:

Transaction

Type:

JPMorgan | Reference:

CR Value Date:

22-Sep-05

COMPLETED

Book Transfer

2747000265JO

TRANSACTIONS

Credit Party >

10/8/2010

Debit Party >

Page 4 of 5

Account ID: DDA - xxxxx7590

Account ID:

DDA - 00000xxxxx [REDACTED]

Name:

DELPHI

Name:

AFFINIA GROUP INC.

CORPORATION-WIRE TRANSFER AC

Address:

1101 TECHNOLOGY DR ANN ARBOR MI 48108-

Address:

CASH MGMT

BUSINESS PROCESS SOLUTION CENTER

PHOENIX AZ 85026-

Intermediary Party >

Account ID:

Beneficiary Party > Account ID:

Name:

Name:

Address:

Address:

Order Party > Account ID: Order Bank >

Name:

399999999

Account ID: Name:

Address:

Address:

4th Credit Party >

Account ID:

Name: Address:

Other Information >

Credit Advice: Mail

Debit

16:21:49

No

Cr Adv Type: Advice

No

Reference:

+050920018

CAP Source: Bank/Bank

Credit

CAP OF 05/09/22

Info:

Reference: Release Time

71G Amount: Bene-D by CHIPS/FED

(EST): Existing

Flag:

Inquiry:

Cover

Payment Details:

FRS# 9200502 Payment:

Joe Miller

Client Service Account Manager JPMorgan · Treasury Services Client Service

611 Woodward Avenue, MI1-8033, Detroit, MI 48226

電Telephone: (313) 256-0323 • 魯Fax: (313) 256-3300 • 図joe.a.miller@jpmchase.com

Back up Contact: Robb Spreen

Office: 713-216-5965 |e-Mail: robb.spreen@jpmchase.com

\*\*For your balance inquiries, item/statement copies, adjustments, fed reference numbers and additional detail on transactional inquiries, please contact our Solution Center via phone at 1-866-544-1815 or e-mail at tss.specialized.servicing@ipmchase.com. Hours of operation: 8:00 am-6:00 pm EST Monday-Friday

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